

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

CAMPAIGN LEGAL CENTER;
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF TEXAS; MEXICAN
AMERICAN LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.; LAWYERS'
COMMITTEE FOR CIVIL RIGHTS
UNDER LAW; and DEMOS A NETWORK
FOR IDEAS AND ACTION, LTD.,

Plaintiffs,

v.

JOHN B. SCOTT, in his official capacity as
Secretary of State of the State of Texas,

Defendant.

Civil Action No. 1:22-cv-92

DECLARATION OF ASHLEY HARRIS

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am an Equal Justice Works Fellow in the American Civil Liberties Union Foundation of Texas' (ACLU Texas) legal department and counsel to Plaintiff ACLU Texas in this action. I am over age 18 and competent to make this Declaration. The facts set forth in this Declaration are based on my personal knowledge. This Declaration is submitted in support of Plaintiffs' Motion for Preliminary Injunction and to Consolidate Preliminary Injunction Hearing with Trial on the Merits.

2. Attached as Exhibit F is a true and correct copy of Travis County's proof of citizenship list that I received from Matthew Entsminger, Assistant County Attorney writing on behalf of the Travis County Tax Assessor-Collector on January 10, 2022 showing, *inter alia*, the number of

voters identified by the Secretary of State as potential non-U.S. citizens based on DPS data who Travis County has confirmed are U.S. citizens. Personally identifying information, including voters' names and Voter Unique Identifiers (VUIDs), have been redacted for privacy purposes.

3. Attached as Exhibit G is a true and correct copy of Collin County's proof of citizenship list that I received from Tim Wyatt, Collin County Public Information Officer on January 11, 2022 showing, *inter alia*, the number of voters identified by the Secretary of State as potential non-U.S. citizens based on DPS data who have since confirmed their citizenship status or who Collin County has otherwise confirmed are U.S. citizens. Personally identifying information, including voters' names and Voter Unique Identifiers (VUIDs) have been redacted for privacy purposes.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 7, 2022 at Houston, Texas.

/s/ Ashley Harris
Ashley Harris